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13 Attorneys for Defendant

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 ROBYN J. WILLIAMS,) Case No: 2:16-cv-00701-GMN-GWF
17 Plaintiff)
18 v.) **JOINT STIPULATION FOR EXTENSION
OF TIME TO FILE DEFENDANT'S
CROSS-MOTION TO AFFIRM**
19 CAROLYN W. COLVIN, Acting)
Commissioner of Social Security,) **(First Request)**
20 Defendant.)
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1 Plaintiff Robyn J. Williams (Plaintiff) and Defendant Carolyn W. Colvin, Acting
2 Commissioner of Social Security (the Commissioner), stipulate, with the approval of this Court,
3 to an extension of time for the Commissioner to file her Cross-Motion To Affirm by thirty days
4 from October 3, 2016 to November 2, 2016. This is the Commissioner's first request for an
5 extension.

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18 There is good cause because, since Plaintiff filed her Motion For Reversal And/Or Remand
19 (Plaintiff's Motion), counsel has been handling a large number of District Court and Ninth Circuit
20 cases in addition to this one, with seven briefs due within the next twenty-four days. Additionally,
21 the Commissioner's counsel has had numerous other deadlines, including a District Court brief
22 filed September 30, 2016, five other District Court briefs filed, as well as several end-of-fiscal year
23 training courses, a number of conferences in an employment case, a settlement agreement, and
24 multiple mentoring and reviewing duties in the Office of the General Counsel. Counsel was also
25 out of the office for approximately two days. As result, the Commissioner needs additional time

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1 to respond properly to the issues Plaintiff raised in her Motion. Plaintiff has no objection.

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3 Respectfully submitted,

4 Date: September 30, 2016 GERALD M. WELT
5 Attorney at Law

6 By: /s/* Cyrus Safa
7 CYRUS SAFA
*by email authorization on 9/30/16

8 Attorneys for Plaintiff

9 Date: September 30, 2016 DANIEL G. BOGDEN
10 United States Attorney
11 BLAINE T. WELSH
Chief, Civil Division

12 By: /s/ April A. Alongi
13 APRIL A. ALONGI
Special Assistant United States Attorney

14 Attorneys for Defendant

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19 IT IS SO ORDERED.
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23 DATE: October 3, 2016

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THE HONORABLE GEORGE FOLEY, JR.
United States Magistrate Judge

1 **DEFENDANT'S CERTIFICATE OF SERVICE**
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4 I certify that I caused the Joint Stipulation For Extension Of Time To File Defendant's Cross-
5 Motion To Affirm (First Request) to be served, via CM/ECF notice, on:

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7 CYRUS SAFA
8 Attorney at Law
9 rohlfing.office@rohlfinglaw.com

10 Respectfully submitted,

11 Date: September 30, 2016

12 DANIEL G. BOGDEN
13 United States Attorney
14 DANIEL G. BOGDEN
15 Chief, Civil Division

16 By: /s/ April A. Alongi
17 APRIL A. ALONGI
18 Special Assistant United States Attorney
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20 Attorneys for Defendant

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